

# Exhibit 10

LOUIS PIA Contains Highly Conf. Testimony  
Keith Fischer, et al. vs GEICO

August 13, 2024

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<p>1</p> <p>2 IN THE UNITED STATES DISTRICT COURT</p> <p>3 FOR THE EASTERN DISTRICT OF NEW YORK</p> <p>4 -----X</p> <p>5 KEITH FISCHER, MICHAEL O'SULLIVAN, JOHN MOESER,</p> <p>6 LOUIS PIA, THOMAS BARDEN, CONSTANCE MANGAN,</p> <p>7 and CHARISE JONES, individually and on behalf</p> <p>8 of all others similarly situated,</p> <p>9 Plaintiffs,</p> <p>10 -against- Case No.</p> <p>11 2:23 Civ. 2848 (GRB) (ARL)</p> <p>12 GOVERNMENT EMPLOYEES INSURANCE COMPANY</p> <p>13 d/b/a GEICO,</p> <p>14 Defendant.</p> <p>15 -----X</p> <p>16 August 13, 2024</p> <p>17 10:00 a.m.</p> <p>18 EXAMINATION BEFORE TRIAL of LOUIS PIA,</p> <p>19 a Plaintiff, taken by counsel for the</p> <p>20 Defendants, pursuant to Order, held at Duane</p> <p>21 Morris, L.L.P., 1540 Broadway, New York, before</p> <p>22 Tiffanie Jones, a Notary Public for and within</p> <p>23 the State of New York.</p> <p>24</p> <p>25</p>	<p>1</p> <p>2 S T I P U L A T I O N S</p> <p>3</p> <p>4 IT IS HEREBY STIPULATED AND AGREED by and</p> <p>5 between the attorneys for the respective parties</p> <p>6 herein, that filing, sealing and certification,</p> <p>7 and the same are, hereby waived.</p> <p>8</p> <p>9 IT IS FURTHER STIPULATED AND AGREED that</p> <p>10 all objections except as to the form of the</p> <p>11 question shall be reserved to the time of the</p> <p>12 trial.</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND AGREED that</p> <p>15 the within deposition may be signed and sworn to</p> <p>16 by an officer authorized to administer an oath,</p> <p>17 with the same force and effect as if signed and</p> <p>18 sworn to before the Court.</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1</p> <p>2 A P P E A R A N C E S :</p> <p>3</p> <p>4 OUTTEN &amp; GOLDEN, L.L.P.</p> <p>5 Attorneys for the Plaintiffs</p> <p>6 685 Third Avenue, 25th Floor</p> <p>7 New York, New York 10017</p> <p>8</p> <p>9 BY: MICHAEL J. SCIMONE, ESQUIRE</p> <p>10 mscimone@outtengolden.com</p> <p>11</p> <p>12 ZARKA SHABIR DSOUZA, ESQUIRE</p> <p>13 zdsouza@outtengolden.com</p> <p>14</p> <p>15</p> <p>16</p> <p>17 DUANE MORRIS, L.L.P.</p> <p>18 Attorneys for the Defendant</p> <p>19 1540 Broadway</p> <p>20 New York, New York 10036</p> <p>21</p> <p>22 BY: GREGORY SLOTNICK, ESQUIRE</p> <p>23 GSSlotnick@duanemorris.com</p> <p>24</p> <p>25</p>	<p>1 PROCEEDINGS</p> <p>2 THE VIDEOGRAPHER: Good morning. We</p> <p>3 are on the record, and the time is</p> <p>4 approximately 10:00 a.m. Today's date</p> <p>5 is August 13th, 2024. This is Media 1</p> <p>6 of the video deposition of Louis Pia, in</p> <p>7 the matter of Keith Fischer, versus</p> <p>8 Government Employees Insurance Company.</p> <p>9 The Index Number is 2:23 Civ. 2848 (GRB)</p> <p>10 (ARL).</p> <p>11 My name is Ben Peretz, legal</p> <p>12 videographer with Shereck Video, in</p> <p>13 association with Esquire. Today, we're</p> <p>14 at the office of the Duane Morris,</p> <p>15 L.L.P., located at 1540 Broadway, New</p> <p>16 York City.</p> <p>17 Would counsel please voice-identify</p> <p>18 yourself, and state whom you represent.</p> <p>19 MR. SLOTNICK: Good morning. My</p> <p>20 name is Greg Slotnick, on behalf of</p> <p>21 GEICO, from Duane Morris.</p> <p>22 MR. SCIMONE: Michael Scimone,</p> <p>23 Outten &amp; Golden, on behalf of</p> <p>24 Plaintiffs.</p> <p>25 MS. DSOUZA: Zarka Shabir Dsouza,</p>

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<p style="text-align: right;">Page 33</p> <p>1 L. PIA</p> <p>2 Q. Got it.</p> <p>3 Did you work in any employment</p> <p>4 positions after the Police Department, before</p> <p>5 you went to GEICO?</p> <p>6 A. Before I went to GEICO, yeah, I was a</p> <p>7 -- affiliated with the -- a -- a security firm,</p> <p>8 Top Security, Incorporated.</p> <p>9 Q. What was your job position with Top</p> <p>10 Security?</p> <p>11 A. Scheduling security for retail stores.</p> <p>12 The -- the name of the company was Circuit</p> <p>13 City. They're no longer in business.</p> <p>14 Q. And how long did you work in that</p> <p>15 position for?</p> <p>16 A. I would say -- would this be an</p> <p>17 estimate or a guess? I would say ten years</p> <p>18 approximately.</p> <p>19 Q. And do you recall when you first</p> <p>20 started working at GEICO?</p> <p>21 A. Yes, it was in the year 2003.</p> <p>22 Q. And just to confirm, did you, in fact,</p> <p>23 receive a pension from the Police Department?</p> <p>24 A. Yes.</p> <p>25 Q. And that was based on your years of</p>	<p style="text-align: right;">Page 35</p> <p>1 L. PIA</p> <p>2 Flanagan?</p> <p>3 A. 45 --</p> <p>4 MR. SCIMONE: Objection.</p> <p>5 THE WITNESS: It was --</p> <p>6 MR. SCIMONE: Objection, but go</p> <p>7 ahead.</p> <p>8 THE WITNESS: -- \$45 an hour.</p> <p>9 BY MR. SLOTNICK:</p> <p>10 Q. Okay. So you do not currently work</p> <p>11 for GEICO; correct?</p> <p>12 A. At this time?</p> <p>13 Q. Yes.</p> <p>14 A. No.</p> <p>15 Q. And what titles did you hold while you</p> <p>16 did work at GEICO?</p> <p>17 A. Before I retired?</p> <p>18 Q. Yeah. So if you -- strike that --</p> <p>19 What was your first job with GEICO?</p> <p>20 A. As a -- a SIU investigator.</p> <p>21 Q. Did that job position change at any</p> <p>22 point in time during your GEICO employment?</p> <p>23 A. Yes.</p> <p>24 Q. When did it change?</p> <p>25 A. Well, let me -- let me backtrack, and</p>
<p style="text-align: right;">Page 34</p> <p>1 L. PIA</p> <p>2 service; correct?</p> <p>3 A. Yes.</p> <p>4 Q. Are you currently employed?</p> <p>5 A. Yes.</p> <p>6 Q. Where do you work?</p> <p>7 A. I work for Flanagan Security,</p> <p>8 approximately three to four days a month.</p> <p>9 Q. Is Flanagan Security a private</p> <p>10 company?</p> <p>11 A. Yes.</p> <p>12 Q. Are they based in New York?</p> <p>13 A. Yes.</p> <p>14 Q. And you work for them three to four</p> <p>15 times a month, you said?</p> <p>16 A. Yes.</p> <p>17 Q. When did you first start working for</p> <p>18 Flanagan?</p> <p>19 MR. SCIMONE: Objection to this line</p> <p>20 of questioning. I'll give you a little</p> <p>21 leeway, but go ahead.</p> <p>22 THE WITNESS: I'm going to say about</p> <p>23 a year ago.</p> <p>24 BY MR. SLOTNICK:</p> <p>25 Q. And what's your rate of pay at</p>	<p style="text-align: right;">Page 36</p> <p>1 L. PIA</p> <p>2 redact my answer. Yes, my -- my job</p> <p>3 description remained the same. My title</p> <p>4 changed. I went from SIU investigator, and got</p> <p>5 promoted to lead investigator.</p> <p>6 Q. When did that occur?</p> <p>7 A. Again, I don't want to guess. An</p> <p>8 estimate would be, like, 2017 maybe.</p> <p>9 Q. Did GEICO have different geographic</p> <p>10 regions where employees were assigned?</p> <p>11 MR. SCIMONE: Objection.</p> <p>12 THE WITNESS: Yes.</p> <p>13 BY MR. SLOTNICK:</p> <p>14 Q. And what region did you start in at</p> <p>15 GEICO?</p> <p>16 A. I was only in one region my whole</p> <p>17 career at GEICO, Region 2.</p> <p>18 Q. And what geographic area was Region 2</p> <p>19 encompassing?</p> <p>20 A. The Metro New York City area, the five</p> <p>21 boroughs. Nassau and Suffolk County.</p> <p>22 Q. And you only worked in Region 2 at</p> <p>23 GEICO, you said?</p> <p>24 A. As opposed to, like, Region 5 in Texas</p> <p>25 or --</p>

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1 L. PIA

2 Q. Yes.

3 A. Yes.

4 Q. Did each region have its own office?

5 A. I know Region 2 had their own office.

6 I don't know about the other offices.

7 Q. Where was the Region 2 office located?

8 A. It was in the GEICO building on

9 Woodbury Road, Nassau County.

10 Q. Which town is that in?

11 A. Woodbury -- well, is it Woodbury or

12 Syosset? Possibly one of the two.

13 Q. Okay. On Long Island?

14 A. Yes.

15 Q. And you describe yourself as an SIU

16 investigator in your first title; is that

17 correct?

18 A. Yes.

19 Q. What were your job responsibilities in

20 that role?

21 A. I was assigned a -- a -- cases that --

22 at the time, upon initial employment, we were

23 assigned cases from claims examiners and --

24 where they suspected fraud was involved.

25 Q. And what were your specific duties

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1 L. PIA

2 with respect to investigating fraud?

3 A. We would do background, database

4 searches on the individuals named in the -- in

5 the claim. We would retrieve police reports,

6 interview witnesses, respond, canvas, locate

7 the scene locations. On occasion, inspect

8 medical facilities, conduct Examinations Under

9 Oath, take recorded statements from witnesses,

10 and other things I -- I don't recall right now.

11 Q. And how did your responsibilities

12 change, if at all, when you became a lead

13 investigator?

14 A. Well, the responsibilities there --

15 there's a -- there's a long gap in between,

16 from 2003 to 2017. So in 14 years, my

17 responsibilities changed. Number one is I got

18 substantial increase in -- in case load in

19 those 14 years. And as a lead investigator at

20 certain points in time, I was asked to either

21 train, or have new investigators accompany me

22 either on Examination Under Oaths or recorded

23 interviews.

24 That being said, I did not -- or it

25 did not come with any supervisory powers. I

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1 L. PIA

2 was -- I was still a lead investigator, just

3 showing them the work that I did.

4 Q. Did the -- strike that.

5 Was your move from a security

6 investigator to a lead investigator a promotion

7 at GEICO?

8 A. Yes.

9 Q. Did you apply for the lead security

10 role?

11 A. I would say yes, but I would also add

12 that that option of applying was removed from

13 only my region for several years, and was still

14 available in the other regions nationally in --

15 in the GEICO company.

16 Q. Do you know why that was?

17 A. My opinion or fact?

18 Q. If you know.

19 A. Well, I mean, I -- I was told that the

20 Regional Vice President, John Pham, had a

21 disliking for us as investigators, and removed

22 that personally from Region 2.

23 Q. Could you spell that individual's

24 name?

25 A. John -- J-o-h-n -- Pham -- P-h-a-m.

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1 L. PIA

2 Q. Who told you that that was the case?

3 A. Several -- several people. Coworkers,

4 we would have discussions regarding that at --

5 at -- at team meetings. And to be quite honest

6 with you -- oh, well. Strike that. It didn't

7 come to light because what happened was: There

8 were only a certain amount of slots for the

9 lead investigators, and there was a time when

10 all those slots were taken. People were, you

11 know, hired and working in those -- in those

12 lead roles. Over the course of time, those

13 people retired, and those slots became

14 available.

15 And I just happened to ask my

16 supervisor, Gerry Cassagne, if -- if the option

17 was, you know, available to fill those slots.

18 And he went -- and I believe Bill Newport was

19 the manager at that time -- and came back to me

20 and -- and Cassagne told me that -- that that

21 option was not available here, but he was going

22 to check to see if it was still available

23 nationally. And then, he came back and told me

24 that it was, in fact, available nationally.

25 And he would check with Bill Newport to see if

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<p style="text-align: right;">Page 69</p> <p>1 L. PIA</p> <p>2 say that would be the -- the busiest time</p> <p>3 regarding case load.</p> <p>4 Q. Before COVID hit, was there --</p> <p>5 A. So -- I'm sorry.</p> <p>6 Q. Before COVID hit, were there certain</p> <p>7 times of the year that were busier than others?</p> <p>8 A. Yeah. I mean, like -- like you asked</p> <p>9 me before, certain weeks and certain months</p> <p>10 fluctuated. We used -- I used to keep a track,</p> <p>11 as far as how many cases we got per month. So</p> <p>12 even before COVID and before 2016, some months,</p> <p>13 you got 30 cases; other months, you may have</p> <p>14 gotten 34. You know, we -- I used to call</p> <p>15 other investigators and say, you know, how many</p> <p>16 cases did you get, you know, this month? But</p> <p>17 then when COVID hit, that's when the case load</p> <p>18 went, you know, total -- totally, you know, out</p> <p>19 of control.</p> <p>20 Q. When you say you called "other</p> <p>21 investigators", who did you call?</p> <p>22 A. I think I may have called Lewonka.</p> <p>23 Q. Anyone else?</p> <p>24 A. He was actually, you know, in my team.</p> <p>25 I don't -- I don't recall. I'm sure I did, but</p>	<p style="text-align: right;">Page 71</p> <p>1 L. PIA</p> <p>2 that was at the meetings, but I remember there</p> <p>3 was -- Mark Giambalvo was there, Keith Fischer,</p> <p>4 John Moeser, Lewonka, myself. There was Richie</p> <p>5 Lenihan. He was pretty vocal at the meetings,</p> <p>6 he's -- he's deceased now, but there was a --</p> <p>7 Connie Mangan maybe was -- was present.</p> <p>8 These monthly meetings that -- that</p> <p>9 were scheduled, I believe all were requested to</p> <p>10 attend, unless you had other business -- you</p> <p>11 know, other GEICO business that you weren't</p> <p>12 able to attend. So there were a lot of</p> <p>13 associates or coworkers at these meetings, and</p> <p>14 the topic of overtime was always brought up.</p> <p>15 Q. Okay. It was brought up by these</p> <p>16 individuals that you mentioned?</p> <p>17 A. Yeah, and other individuals that I</p> <p>18 don't specifically remember their name. The</p> <p>19 case load and -- and overtime.</p> <p>20 Q. Were the monthly meetings in person?</p> <p>21 A. The monthly meetings were in person.</p> <p>22 And then, I think, during COVID, they had some</p> <p>23 type of Zoom meetings.</p> <p>24 Q. Were they your entire team, or the</p> <p>25 entire -- the entire region, if you recall?</p>
<p style="text-align: right;">Page 70</p> <p>1 L. PIA</p> <p>2 I don't recall specifically the names of the</p> <p>3 other associates.</p> <p>4 Q. And earlier, you testified that you</p> <p>5 used to ask for overtime for work above 38.75</p> <p>6 hours; correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And I believe you used the</p> <p>9 phrase "we". You were told -- you said, "We</p> <p>10 were told no."</p> <p>11 Is that correct?</p> <p>12 A. Yes.</p> <p>13 Q. Who is "we" that you're referring to</p> <p>14 there?</p> <p>15 A. Myself and other coworkers.</p> <p>16 Q. Which coworkers?</p> <p>17 A. Well, when I say "we", I did, you</p> <p>18 know, converse with -- with other associates.</p> <p>19 And also present at monthly meetings, where the</p> <p>20 topic was brought up that, you know, other</p> <p>21 coworkers were -- were present, where we were</p> <p>22 told that we weren't getting overtime.</p> <p>23 Q. Which other associates are you</p> <p>24 referring to specifically?</p> <p>25 A. Again, I -- I -- I can't name everyone</p>	<p style="text-align: right;">Page 72</p> <p>1 L. PIA</p> <p>2 A. The entire region, I don't -- meaning</p> <p>3 the SI -- the whole entire region to SIU unit?</p> <p>4 Q. Yeah. What was the scope of the</p> <p>5 invitees to these monthly meetings?</p> <p>6 A. What do you mean by "scope"?</p> <p>7 Q. So who was generally invited to these</p> <p>8 meetings, if you know?</p> <p>9 A. I don't know who -- who was invited to</p> <p>10 the meetings because I didn't do the</p> <p>11 invitations; but unless you had other business,</p> <p>12 which could be like an EUO scheduled or</p> <p>13 something like that, the invitation to the</p> <p>14 meetings -- now this is pre-COVID, okay -- was</p> <p>15 to everyone, I believe, in the unit.</p> <p>16 Q. Everyone in the SIU, are you saying?</p> <p>17 A. In the SIU unit, I believe, yes.</p> <p>18 Q. Was that only in Region 2, or was that</p> <p>19 beyond Region 2?</p> <p>20 A. I don't know what other regions did,</p> <p>21 and I would -- I don't -- I could -- I could</p> <p>22 say I -- I was never in a meeting in SIU unit,</p> <p>23 other than Region 2. Like, I never attended a</p> <p>24 -- a -- a SIU Region 5 meeting.</p> <p>25 MR. SLOTNICK: We can go off the</p>

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<p>1 L. PIA</p> <p>2 were done-done, but --</p> <p>3 MR. SLOTNICK: Yeah.</p> <p>4 THE VIDEOGRAPHER: We are going off</p> <p>5 the record, and the time is 15:14.</p> <p>6 (Short break was taken off the</p> <p>7 record.)</p> <p>8 THE VIDEOGRAPHER: We are back on</p> <p>9 the record, and the time is 15:15.</p> <p>10 EXAMINATION BY</p> <p>11 MR. SCIMONE, ESQUIRE:</p> <p>12 Q. All right. Mr. Pia, my name is</p> <p>13 Michael Scimone, I'm your attorney, as you</p> <p>14 know. I have a few followup questions about</p> <p>15 your testimony earlier today.</p> <p>16 So you testified early in the</p> <p>17 proceeding that it was your understanding that</p> <p>18 the Regional Manager, John Pham, had a dislike</p> <p>19 for your region. Do you recall that testimony?</p> <p>20 A. Yes.</p> <p>21 Q. Do you have an under -- any</p> <p>22 understanding why -- what the source of that</p> <p>23 dislike was?</p> <p>24 A. Yes, I -- I was led to believe and</p> <p>25 informed that he didn't like police officers.</p>	<p>1 L. PIA</p> <p>2 BY MR. SCIMONE:</p> <p>3 Q. And you testified about that -- those</p> <p>4 home office meetings and your understanding of</p> <p>5 what went on there. Toward the end of the day,</p> <p>6 you mentioned hearing something about that from</p> <p>7 Marie Butler.</p> <p>8 My question is whether you learned</p> <p>9 about those meetings from any other source</p> <p>10 besides Ms. Butler?</p> <p>11 MR. SLOTNICK: Objection.</p> <p>12 THE WITNESS: Yes, I -- I learned</p> <p>13 from Gerry Cassagne. He actually</p> <p>14 attended one of the meetings with Bill</p> <p>15 Newport. And when he came back, in sum</p> <p>16 and substance, he was like, you know,</p> <p>17 Bill got his butt handed to him. We</p> <p>18 were really low in the nation regarding</p> <p>19 case load and things are going to</p> <p>20 change, and so on and so forth.</p> <p>21 BY MR. SCIMONE:</p> <p>22 Q. And did you have any understanding</p> <p>23 from that conversation about what that meant</p> <p>24 for the unit, or for Mr. Newport, in terms of</p> <p>25 his standing in the company?</p>
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<p>1 L. PIA</p> <p>2 And many of us SIU investigators were retired</p> <p>3 police officers.</p> <p>4 Q. You had testified in the course of the</p> <p>5 day that you got cases re -- referred to you</p> <p>6 from different sources within GEICO.</p> <p>7 Do you recall that testimony?</p> <p>8 MR. SLOTNICK: Objection.</p> <p>9 THE WITNESS: Yes.</p> <p>10 BY MR. SCIMONE:</p> <p>11 Q. All right. Based on your</p> <p>12 understanding, what was the role of management,</p> <p>13 if any, in controlling or overseeing the flow</p> <p>14 of the different cases to investigators in your</p> <p>15 unit?</p> <p>16 MR. SLOTNICK: Objection.</p> <p>17 THE WITNESS: It changed drastically</p> <p>18 during my 19 and-a-half years. Towards</p> <p>19 the end, which -- which is the time</p> <p>20 period between 2016 and 2022, the case</p> <p>21 load was demanded to be higher by the</p> <p>22 manager. So as not to be embarrassed</p> <p>23 when he went to the end-of-the-year home</p> <p>24 office meetings in Virginia.</p> <p>25</p>	<p>1 L. PIA</p> <p>2 MR. SLOTNICK: Objection.</p> <p>3 THE WITNESS: I -- I -- the -- the</p> <p>4 company as a whole -- well, not the</p> <p>5 company -- strike that. The unit as a</p> <p>6 whole was going to be affected because</p> <p>7 it would get -- and again, I was -- my</p> <p>8 understanding was putting myself in Bill</p> <p>9 Newport's shoes, and I -- I didn't want</p> <p>10 to go back there next year, and still be</p> <p>11 in the low-man, as far as case load. So</p> <p>12 there had to be a change and -- and</p> <p>13 there was. There was an increase in</p> <p>14 cases and -- and it was for the whole</p> <p>15 unit, not just a specific team or -- or</p> <p>16 -- or investigator.</p> <p>17 BY MR. SCIMONE:</p> <p>18 Q. You mentioned the program WebEx today,</p> <p>19 and you testified about seeing a green</p> <p>20 indicator that showed to you the people who</p> <p>21 were working. Do you recall that?</p> <p>22 A. Yes.</p> <p>23 MR. SLOTNICK: Objection.</p> <p>24 THE WITNESS: Yes.</p> <p>25</p>



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<p>1 L. PIA</p> <p>2 Q. You testified as to meetings that John</p> <p>3 Pham attended, where unpaid-time issues were</p> <p>4 raised. Is that accurate?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. Do you recall when those</p> <p>7 meetings were?</p> <p>8 A. They were -- the exact years, I do not</p> <p>9 know, but it was pre-COVID.</p> <p>10 Q. And you also testified with respect to</p> <p>11 Gerry Cassagne providing you information with</p> <p>12 respect to the home office meetings; is that</p> <p>13 correct?</p> <p>14 A. Yes.</p> <p>15 Q. And all of your testimony with respect</p> <p>16 to the home office meetings, is that all</p> <p>17 through information that you learned through</p> <p>18 speaking with Gerry?</p> <p>19 A. Yeah, Bill Newport was another</p> <p>20 attendee, and I never heard anything from him</p> <p>21 regarding that.</p> <p>22 MR. SLOTNICK: I have nothing</p> <p>23 further.</p> <p>24 MR. SCIMONE: Neither do I. Thank</p> <p>25 you.</p>	<p>1 L. PIA</p> <p>2 C E R T I F I C A T E</p> <p>3</p> <p>4 STATE OF NEW YORK )</p> <p>5 :SS</p> <p>6 COUNTY OF NEW YORK )</p> <p>7</p> <p>8 I, TIFFANIE JONES, a Notary Public within</p> <p>9 and for the State of New York, do hereby</p> <p>10 certify:</p> <p>11 That the witness whose examination is</p> <p>12 hereinbefore set forth was duly sworn and that</p> <p>13 such an examination is a true record of the</p> <p>14 testimony given by such a witness.</p> <p>15 I further certify that I am not related to</p> <p>16 any of these parties to this action by blood or</p> <p>17 marriage, and that I am not in any way</p> <p>18 interested in the outcome of this matter.</p> <p>19 IN WITNESS WHEREOF, I have hereunto set my</p> <p>20 hand this 13th day of August, 2024.</p> <p>21</p> <p>22</p> <p>23 <i>Tiffany Jones</i></p> <p>24 TIFFANIE JONES</p> <p>25</p>										
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<p>1 L. PIA</p> <p>2 MR. SLOTNICK: Thank you. All</p> <p>3 right.</p> <p>4 THE VIDEOGRAPHER: This -- this</p> <p>5 concludes the video deposition of Louis</p> <p>6 Pia. The time is approximately 15:24,</p> <p>7 end of Media 7. We are off the record.</p> <p>8 Thank you, everyone.</p> <p>9 THE REPORTER: Mr. Scimone, would</p> <p>10 you like to purchase a copy of this</p> <p>11 transcript?</p> <p>12 MR. SCIMONE: Yeah. We're going to</p> <p>13 do a three-day. Let's do three days.</p> <p>14 THE REPORTER: You want it in three</p> <p>15 days. Okay. Thank you.</p> <p>16 (Thereupon, the examination was</p> <p>17 concluded at 3:24 p.m.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>1 L. PIA</p> <p>2 INDEX</p> <p>3 EXAMINATION OF LOUIS PIA</p> <p>4</p> <table><tr><td data-bbox="899 1205 1062 1226">EXAMINATION BY</td><td data-bbox="1354 1205 1403 1226">PAGE</td></tr><tr><td data-bbox="899 1236 1029 1257">Mr. Slotnick</td><td data-bbox="1338 1236 1403 1257">5-216</td></tr><tr><td data-bbox="899 1268 1029 1289">Mr. Scimone</td><td data-bbox="1321 1268 1403 1289">217-222</td></tr></table> <p>8</p> <table><tr><td data-bbox="899 1341 1143 1362">FURTHER EXAMINATION BY</td><td data-bbox="1321 1373 1403 1394"></td></tr><tr><td data-bbox="899 1373 1029 1394">Mr. Slotnick</td><td data-bbox="1321 1373 1403 1394">223-225</td></tr></table> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	EXAMINATION BY	PAGE	Mr. Slotnick	5-216	Mr. Scimone	217-222	FURTHER EXAMINATION BY		Mr. Slotnick	223-225
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